



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

November 20, 2015

*Due 12-30-15
RT*

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

Mr. John Wagner
Diamond Chrome Plating, Inc.
604 South Michigan Avenue
P.O. Box 557
Howell, Michigan 48844

Dear Mr. Wagner:

SUBJECT: Compliance Communication Regarding the November 1, 2015,
Progress Report for the Diamond Chrome Plating (DCP) Facility,
604 South Michigan Avenue, Howell, Livingston County, Michigan;
First Amended Judicial Consent Decree (JCD) No. 03-1862-CE;
Facility ID No.: 47000202

The Department of Environmental Quality (DEQ), Remediation and Redevelopment Division (RRD), Lansing District Office, completed the review of your Progress Report submitted October 29, 2015, for completeness of required elements pursuant to Section 6.11 of the First Amended Consent Decree effective July 28, 2015. This Progress Report was due November 1, 2015, and is considered timely.

Data contained in the Progress Report included the revised implementation schedule; access agreements (city of Howell); water table elevations; monitoring wells and sampling frequency table; groundwater analytical data; laboratory quality assurance/quality control from the two deep monitoring wells; temporary wells SB-1-15 through SB-10-15; monitor wells 604-14, 605-14; and soils analytical data from SB-7-15 3 to 8 feet.

Section 6.11(a) of the above referenced JCD states the following: "These progress reports shall include the following information unless the information has been previously provided to DEQ as a separate submittal, in which case, Defendant shall specifically reference such submittal in the Progress Report." The DEQ, RRD, has not received the following data/information relevant to this section:

1. Updated facility map showing the locations of all of the soil borings and monitoring wells depicted on Exhibit 6.11(b)(viii). The map must be large enough to be legible. Refer to Section 6.11(a)(ii) and (ix).
2. Boring logs for borings completed in 2014 through October 15, 2015, including temporary wells and installed monitor well locations that include ground elevations for the temporary wells/borings. Refer to Section 6.11(a) (ii) and (ix).

3. Analytical data for the 2014 through October 15, 2015, borings not previously submitted to the DEQ. Please cite which analytical data was provided to the DEQ and how it was transmitted for this period. Refer to Section 6.11(a)(ii) and (ix).
4. A description of the activities associated with installation of the 2014 through October 15, 2015, soil borings. Refer to Section 6.11(a)(ii) and (ix).
5. A *complete* description of the current understanding of environmental conditions based on the Conceptual Site Model to date. Refer to Section 6.11(a)(iv).
6. A description of data collection and other activities scheduled for the next reporting period. Refer to Section 6.11(a)(viii).
7. Data relevant to response activities performed pursuant to the JCD. This includes a description of groundwater pumping, analytical and water table elevation data from MW-404 and other monitoring wells on the DCP property used to perform response activities related to lowering the water table to prevent unacceptable concentrations of contaminants from entering the city of Howell sanitary sewer. Please include a description of DCP's mitigation of soils and contaminants in excavated out cement when on the east side of the plant to support a chrome polishing tank, and a summary of work conducted to mitigate and prevent hazardous substance releases into the environment from the exterior air handling ductwork including installation of new ductwork on the east side of the DCP plant. Refer to Section 6.11(a)(ii) and (ix).
8. A description of the nature and amount of waste materials that were generated as part of the response activities. The DEQ, RRD, is aware that investigative and other wastes were generated during the reporting period of this Progress Report as referenced in Item 7. Refer to Section 6.11(a)(vi).

DCP's submittal of the November 1, 2015, Progress Report is not considered complete unless the above referenced data and information is provided to the DEQ, RRD, within *30 days of receipt of this communication* pursuant to Section 14.3 of the JCD.

If any of the requested data was provided to other DEQ divisions, it must be fully referenced in the Progress Report pursuant to Section 6.11(a). This communication may not represent all of the administrative elements required by other DEQ divisions who may request data relevant to their sections of the JCD at a later date.

If you have any questions regarding elements necessary to complete the November 1, 2015, Progress Report, please contact Ms. Rebecca Taylor, at 517-284-5160, or taylorr@michigan.gov.

If you have questions regarding your obligations under the JCD, please contact Ms. Meredith Hartmann, at 517-284-5066, or hartmannm1@michigan.gov; or Ms. Vicki Katko, at 517-284-5119, or katkov@michigan.gov.

Sincerely,



Dennis Eagle, District Supervisor
Lansing District Office
Remediation and Redevelopment Division
517-284-5089
eagled@michigan.gov

cc: Mr. Todd Fracassi, Pepper Hamilton LLP
Mr. James Colmer, BB&E, LLC
Mr. Richard Kuhl, Department of Attorney General
Ms. Nichole Zacharda, DEQ
Ms. Carla Davidson, DEQ
Mr. Dan McGeen, DEQ
Mr. Bryan Grochowski, DEQ
Ms. Meredith Hartman, DEQ
Ms. Vicki Katko, DEQ
Ms. Rebecca Taylor, DEQ